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Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MOHAMMAD SHARIFI,

Defendant.

CASE NO. 4:23-mj-70888-MAG

NOTICE OF PROCEEDINGS ON OUT-OF-DISTRICT CRIMINAL CHARGES PURSUANT TO RULES 5(c)(2) AND (3) OF THE FEDERAL RULES OF CRIMINAL PROCEDURE

Please take notice pursuant to Rules 5(c)(2) and (3) of the Federal Rules of Criminal Procedure that on June 21, 2023, the above-named defendant was arrested pursuant to an arrest warrant (copy attached) issued upon an

☒ Indictment

☐ Information

☐ Criminal Complaint

☐ Other (describe) _____

pending in the _____ Middle _____ District of _____ Louisiana _____, Case Number 23-cr-52-JWD-WED.

In that case (copy of indictment attached), the defendant is charged with a violation of Title 21 United States Code, Sections 841(a)(1), 846, and 18 U.S.C. § 2, aiding and abetting.

FILED

Jun 21 2023

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

1 Description of Charges: Conspiracy to distribute and possess with the intent to distribute 400 grams or
2 more of fentanyl.

3 The maximum penalties are as follows: 10 years mandatory minimum to life imprisonment, and
4 if death or serious bodily injury resulted then a mandatory minimum of 20 years to life imprisonment.
5

6 Respectfully Submitted,

7 ISMAIL J. RAMSEY
8 UNITED STATES ATTORNEY

9 Date: June 21, 2023

10 //s//
11 MAUREEN C. BESSETTE
12 Assistant United States Attorney
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UNITED STATES DISTRICT COURT

for the

Middle District of Louisiana

United States of America

v.

NICHOLAS CRITNEY

Case No. 23-cr-52-JWD-EWD

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay*(name of person to be arrested)* NICHOLAS CRITNEY

who is accused of an offense or violation based on the following document filed with the court:

- ☒ Indictment
 ☐ Superseding Indictment
 ☐ Information
 ☐ Superseding Information
 ☐ Complaint
- ☐ Probation Violation Petition
 ☐ Supervised Release Violation Petition
 ☐ Violation Notice
 ☐ Order of the Court

This offense is briefly described as follows:

Conspiracy to distribute and to possess with the intent to distribute fentanyl, in violation of 21 U.S.C § 846 and 18 U.S.C. § 2.

Date: 06/15/2023

City and state: Baton Rouge, LA


Issuing officer's signature

Erin Wilder-Doomes, U.S. Magistrate Judge

Printed name and title

Return

This warrant was received on *(date)* _____, and the person was arrested on *(date)* _____
 at *(city and state)* _____.

Date: _____

*Arresting officer's signature**Printed name and title*

This second page contains personal identifiers provided for law-enforcement use only and therefore should not be filed in court with the executed warrant unless under seal.

(Not for Public Disclosure)

Name of defendant/offender: Nicholas Critney

Known aliases: _____

Last known residence: _____

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: _____

Date of birth: 1991

Social Security number: 100-00-0776

Height: 5'9" Weight: 193

Sex: Male Race: Black

Hair: Black Eyes: Brown

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates (name, relation, address, phone number): _____

FBI number: DFNPV75K1

Complete description of auto: _____

Investigative agency and address: FBI, 18134 Petroleum Drive, Baton Rouge, LA 70809

Name and telephone numbers (office and cell) of pretrial services or probation officer (if applicable): _____

Date of last contact with pretrial services or probation officer (if applicable): _____

UNITED STATES DISTRICT COURT

for the

Middle District of Louisiana

United States of America

v.

MOHAMMAD SHARIFI,
a.k.a "Moe"

Defendant

Case No. 23-cr-52-JWD-EWD

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay(name of person to be arrested) MOHAMMAD SHARIFI, a.k.a. "Moe",

who is accused of an offense or violation based on the following document filed with the court:

- ☒ Indictment
 ☐ Superseding Indictment
 ☐ Information
 ☐ Superseding Information
 ☐ Complaint
☐ Probation Violation Petition
 ☐ Supervised Release Violation Petition
 ☐ Violation Notice
 ☐ Order of the Court

This offense is briefly described as follows:

Conspiracy to distribute and to possess with the intent to distribute fentanyl, in violation of 21 U.S.C § 846 and 18 U.S.C. § 2.

Date: 06/15/2023

Issuing officer's signature

City and state: Baton Rouge, LAErin Wilder-Doomes, U.S. Magistrate Judge

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
 at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title

This second page contains personal identifiers provided for law-enforcement use only and therefore should not be filed in court with the executed warrant unless under seal.

(Not for Public Disclosure)

Name of defendant/offender: Mohammad Sharifi

Known aliases: "Moe"

Last known residence:

Prior addresses to which defendant/offender may still have ties:

Last known employment:

Last known telephone numbers:

Place of birth:

Date of birth: 1988

Social Security number: 3405

Height: 5'11" Weight: 150 lbs

Sex: Male Race: White

Hair: Black Eyes: Green

Scars, tattoos, other distinguishing marks:

History of violence, weapons, drug use:

Known family, friends, and other associates (name, relation, address, phone number):

FBI number: 625534JC3

Complete description of auto:

Investigative agency and address: FBI, 18134 Petroleum Drive, Baton Rouge, LA 70809

Name and telephone numbers (office and cell) of pretrial services or probation officer (if applicable):

Date of last contact with pretrial services or probation officer (if applicable):

UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF LOUISIANA

INDICTMENT FOR CONSPIRACY TO DISTRIBUTE AND TO POSSESS
WITH THE INTENT TO DISTRIBUTE FENTANYL,
AND NOTICE OF FORFEITURE

UNITED STATES OF AMERICA	:	
	:	CRIMINAL NO. 23-52-JWD-EWD
<i>versus</i>	:	
	:	
ROBERT PENNYWELL,	:	
a.k.a. "Black Bo,"	:	21 U.S.C. § 846
a.k.a. "Black Beezy"	:	21 U.S.C. § 841(a)(1)
MOHAMMAD SHARIFI,	:	18 U.S.C. § 2
a.k.a. "Moe," and	:	21 U.S.C. § 853
NICHOLAS CRITNEY	:	

THE GRAND JURY CHARGES:

Beginning on or about March 28, 2023, and continuing until on or about May 18, 2023, in the Middle District of Louisiana, **ROBERT PENNYWELL**, a/k/a "Black Bo" & "Black Beezy," **MOHAMMED SHARIFI**, a/k/a "Moe," and **NICHOLAS CRITNEY**, defendants herein, did conspire with each other and others known and unknown to the Grand Jury, to knowingly and intentionally distribute and to possess with the intent to distribute 400 grams or more of N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanamide ("fentanyl"), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and did aid and abet the commission of said conspiracy.

The above is a violation of Title 21, United States Code, Section 846, and Title 18, United States Code, Section 2.

USA Sealed Group
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NOTICE OF FORFEITURE

The allegations contained in this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853(p).

Upon conviction of the offense alleged in the indictment, defendants **ROBERT PENNYWELL**, a.k.a. "Black Bo" & "Black Beezy," **MOHAMMED SHARIFI**, a.k.a. "Moe," and **NICHOLAS CRITNEY** shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of said offenses and any property used, or intended to be used, in any manner or part, to commit or to facilitate the commission of said offenses.

If any of the property or proceeds obtained directly or indirectly as a result of the offense charged, due to an act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property described above.

UNITED STATES OF AMERICA, BY

A TRUE BILL



RONALD C. GATHE, JR.
UNITED STATES ATTORNEY
MIDDLE DISTRICT OF LOUISIANA

REDACTED
PER PRIVACY ACT

GRAND JURY FOREPERSON



WILLIAM K. MORRIS
ASSISTANT UNITED STATES ATTORNEY

6/15/23
DATE

Criminal Cover Sheet**U.S. District Court****Place of Offense:****Matter to be sealed:**

Yes



No

City: Baton Rouge, LA**Related Case Information:**County/Parish: East Baton Rouge

Superseding BOI _____

Docket Number _____

Same Defendant x

New Defendant _____

*Investigating Agency: FBIMagistrate Case Number: 23-mj-52*Agent: Michael Landenwich

Search Warrant Case No.: _____

R 20/ R 40 from District of: _____

Any Other Related Cases: _____

Defendant Information:Defendant Name: Robert PennywellAlias: "Black Bo" and "Black Beezy"

Address: _____

Birthdate: _____ SS #: _____ Sex: _____ Race: _____ Nationality: _____

U.S. Attorney Information:AUSA: William K. MorrisBar #: LABN: 28694Interpreter: ☐ Yes ☒ No

List language and/or dialect: _____

Location Status:

Arrest Date _____

x

Already in Federal Custody as of _____

Already in State Custody _____

On Pretrial Release _____

U.S.C. Citations:Total # of Counts: 1

<u>Code</u>	<u>Description of Offense Charged</u>	<u>Count(s)</u>	<u>Petty/ Misdemeanor/ Felony</u>
<u>21:846 and 18:2</u>	<u>Conspiracy to distribute and to possess with</u>	<u>1</u>	<u>F</u>
_____	<u>the intent to distribute fentanyl.</u>	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

Date: 06/15/2023

Signature of AUSA: _____



Criminal Cover Sheet**U.S. District Court****Place of Offense:****Matter to be sealed:**

Yes




No

City: Baton Rouge, LA

Related Case Information:

County/Parish: East Baton RougeSuperseding BOI Docket Number Same Defendant xNew Defendant *Investigating Agency: FBIMagistrate Case Number: 23-mj-52Search Warrant Case No.: *Agent: Michael LandenwichR 20/ R 40 from District of: Any Other Related Cases: **Defendant Information:**Defendant Name: Mohammad SharifiAlias: "Moe"Address: Birthdate: SS #: Sex: Race: Nationality: **U.S. Attorney Information:**AUSA: William K. MorrisBar #: LABN: 28694Interpreter: ☐ Yes ☒ NoList language and/or dialect: **Location Status:**Arrest Date xAlready in Federal Custody as of Already in State Custody On Pretrial Release **U.S.C. Citations:**Total # of Counts: 1

<u>Code</u>	<u>Description of Offense Charged</u>	<u>Count(s)</u>	<u>Petty/ Misdemeanor/ Felony</u>
<u>21:846 and 18:2</u>	<u>Conspiracy to distribute and to possess with</u>	<u>1</u>	<u>F</u>
<u> </u>	<u>the intent to distribute fentanyl.</u>	<u> </u>	<u> </u>
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Date: 06/15/2023Signature of AUSA: 

Criminal Cover Sheet**U.S. District Court****Place of Offense:****Matter to be sealed:**

Yes



No

City: Baton Rouge, LA

Related Case Information:

County/Parish: East Baton RougeSuperseding BOI Docket Number Same Defendant New Defendant x*Investigating Agency: FBIMagistrate Case Number: 23-mj-52Search Warrant Case No.: *Agent: Michael LandenwichR 20/ R 40 from District of: Any Other Related Cases: **Defendant Information:**Defendant Name: Nicholas CritneyAlias: Address: Birthdate: SS #: Sex: Race: Nationality: **U.S. Attorney Information:**AUSA: William K. MorrisBar #: LABN: 28694Interpreter: ☐ Yes ☒ NoList language and/or dialect: **Location Status:**Arrest Date Already in Federal Custody as of Already in State Custody On Pretrial Release**U.S.C. Citations:**Total # of Counts: 1

<u>Code</u>	<u>Description of Offense Charged</u>	<u>Count(s)</u>	<u>Petty/ Misdemeanor/ Felony</u>
<u>21:846 and 18:2</u>	<u>Conspiracy to distribute and to possess with</u>	<u>1</u>	<u>F</u>
<u> </u>	<u>the intent to distribute fentanyl.</u>	<u> </u>	<u> </u>
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Date: 6/15/2023Signature of AUSA: 